Lawrence E. Heller, Esq. 1 TURNER, GERSTENFELD, WILK & TIGERMAN 8383 Wilshire Boulevard 2 Suite 510 Beverly Hills, CA 90211 3 (213) 657-3100 4 Attorneys for Defendants 5 AUTHOR SERVICES, INC. AND BRIDGE PUBLICATIONS, INC. 6 7 SUPERIOR COURT OF THE STATE OF CALIFORNIA 8 FOR THE COUNTY OF LOS ANGELES 9 10 BENT CORYDON, 11 Plaintiff, 12 vs. 13 CHURCH OF SCIENTOLOGY 14 INTERNATIONAL, et al., 15

CASE NO. C 694 401

Defendants. AND RELATED CROSS-ACTIONS

NOTICE OF TAKING OF DEPOSITION OF GERALD ARMSTRONG AND REQUEST FOR PRODUCTION OF **DOCUMENTS**

TO ALL INTERESTED PARTIES AND THEIR ATTORNEYS OF RECORD.

PLEASE TAKE NOTICE that defendants AUTHOR SERVICES, INC. and BRIDGE PUBLICATIONS, INC. will take the oral deposition of Gerald Armstrong on April 24, 1990 at 10:00 a.m. at law offices of Toby L. Plevin located at 6380 Wilshire Boulevard, Suite 1600, Los Angeles, California after plaintiff (who has previously noticed and subpensed Gerald Armstrong for deposition on said date) has completed its questioning. Said deposition shall continue from day to day until completed unless other arrangements are made on the record.

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PLEASE TAKE FURTHER NOTICE that Gerald Armstrong is hereby requested to produce the following items at the time of his deposition:

Tape(s), or any other records, whether sound or written, of recordings of any and all telephone conversation(s) between Lawrence E. Heller and Gerald Armstrong whether such tape(s) record both participants or one participant to said telephone conversation(s).

Said deposition shall be taken before a duly commissioned Notary Public who may appear therefore.

Dated: April ≥, 1990

TURNER, GERSTENFELD, WILK & TIGERMAN

BY:

Lawrence E. Heller Attorneys for Defendants AUTHOR SERVICES, INC. and BRIDGE PUBLICATIONS, INC. That the above documents are material to the issues involved in the case by reason of the following facts:

Deponent has filed a declaration in this litigation in support of plaintiff's case, and one of plaintiff's motions, wherein telephone call(s) with Lawrence E. Heller were described. The attorney for plaintiff, Toby Plevin, has stated on the Court's record that recordings were made of those telephone call(s). The content of those telephone calls are disputed.

That good cause exists for the production of the above described matters and things by reason of the following facts:

Defendants herein have no other source of obtaining this information other than this method.

WHEREFORE request is made that the Subpoena Duces Tecum issue

Executed April 3

. 19 90 , at Beverly Hills , California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

(Signature of Declarant)
Lawrence E. Heller

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 8383 Wilshire Boulevard, Suite 510, Beverly Hills, California 90211.

On April 3, 1990, I served the foregoing document described as NOTICE OF TAKING DEPOSITION OF GERALD ARMSTRONG AND REQUEST FOR PRODUCTION OF DOCUMENTS by placing [] the original [x] a true copy thereof enclosed in sealed envelopes addressed as follows:

Toby L. Plevin, Esq. 6380 Wilshire Boulevard Suite 1600 Los Angeles, CA 90025

Kendrick Moxon, Esq. Bowles & Moxon 6255 Sunset Boulevrd Suite 2000 Los Angeles, CA 90028

William T. Dresher, Esq.

Wyman, Bautzer, Kuchel & Silbert

2049 Century Park East

14th Floor

Los Angeles, CA 90067

Michael Hert:

740 Broadway

5th Floor

New York, New

Michael Hertzberg 740 Broadway 5th Floor New York, New York 10003

[x] BY MAIL - I deposited such envelope in the mail at Beverly Hills, California. The envelope was mailed with postage thereon fully prepaid as follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Beverly Hills, California in the ordinary cause of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

- [] BY PERSONAL SERVICE I delivered such an envelope by hand to the offices of the addressee.
- [x] (State) I declare under the penalty of perjury under the laws of the State of California that the above is true and correct.
- [] (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on April 3, 1990, at Beverly Hills, California.

SUSAN T. FLEMING